DOCUMENT RESUME

ED 181 628 EC 122 000

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TITLE Classification and Labeling Issues: Toward Operationalizing Legal Definitions of Handicapping Conditions.
PUB DATE Sep 79
NOTE 22p.; Paper presented at the Annual Convention of the American Psychological Association (New York, NY, September 1, 1979)

EDRS PRICE MF01/PC01 Plus Postage.
DESCRIPTORS *Definitions; Educational Diagnosis; *Educational Legislation; Federal Legislation; *Handicapped Children; *Identification; Incidence; Labeling (of Persons); Mainstreaming; *Models; Program Descriptions; *Program Development; Trend Analysis
IDENTIFIERS Education for All Handicapped Children Act; Rehabilitation Act 1973 (Section 504); South Carolina

ABSTRACT

A review of the legal basis for and a model of operationalizing definitions of handicapping conditions is presented along with a trend analysis of the association between operationalized criteria and stability in incidence rates. The role of Public Law 94-142 (the Education for All Handicapped Children Act), Public Law 93-380, and Section 504 of the Rehabilitation Act of 1973 (Public Law 93-112) are discussed. The South Carolina Board of Education model for an operationalized approach to the identification and placement of handicapped school children is examined. It is explained that South Carolina has eight categories of handicapping conditions and has largely avoided the pitfalls of the negative effects of labeling through the close monitoring of evaluation instruments, parent involvement, group decision making, and procedural safeguards. The specific identification and placement criteria for four of the handicapping categories (educable mentally handicapped, trainable mentally handicapped, learning disabled, emotionally handicapped) is provided. Tables detailing the effects of the South Carolina model on the incidence rates of handicapping conditions are included. (PHR)

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# CLASSIFICATION AND LABELING ISSUES: TOWARD OPERATIONALIZING LEGAL DEFINITIONS OF HANDICAPPING CONDITIONS

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Presented at the Annual Convention of
The American Psychological Association,
September 1, 1979, New York, New York.

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CLASSIFICATION AND LABELING ISSUES:

TOWARD OPERATIONALIZING LEGAL DEFINITIONS OF HANDICAPPING CONDITIONS

Legal Basis for Operationalizing Definitions of Handicapping Conditions

The Federal Government has traditionally exercised relatively little direct authority over psychological and educational assessment practices in the schools; however, as a result of Public Laws 93-380, 93-112, 94-142, Title VI of the Civil Rights Act and Title IX of the Education Amendments of 1972, actions at the Federal and State level which have an influence on assessment practices are becoming increasingly extensive.

Public Law 94-142 is a federal mandate to serve all handicapped children with an appropriate educational program at no cost to the parents. The law stipulates that all handicapped children, ages 3-21 years, must be given a free and appropriate education. For each handicapped child served, Public Law 94-142 requires the development of an individualized written educational program to be designed initially in consultation with parents and to be reviewed annually. Also, in accordance with previously existing law (P. L. 93-380), the Legislation guarantees due process rights with the respect to identification evaluation, and educational placement of all handicapped children. Public Law 94-142 further refines these positions with assurances that: (1) special education is being provided in the least restrictive environment; (2) policies and procedures are established to protect the confidentiality of information; and (3) materials and methods utilized for the purpose of classification and placement of handicapped children will not racially or culturally discriminatory.

In addition to Public Laws 93-380 and 94-142, at the federal level the Legislation which has had the most far reaching influence on assessment practices has been the Civil Rights Act of 1964. Title VI, Section 601, of the Civil Rights Act of 1964 provides that no person shall be discriminated against because of race, color, or national origin in any program or activity that receives federal financial assistance. And too, Title IX, of the Education Amendments of 1972, prohibits discrimination on the basis of sex in

educational programs and in activities benefiting from federal financial assistance. (The Office of Civil Rights is directly responsible for enforcing these regulations.) If a school system refuses to correct practices contrary to policies of compliance with Title VI or Title IX, HEW can initiate administrative proceedings for the termination of federal financial assistance or can refer the matter to the courts.

In 1972 the Office of Civil Rights issued a memorandum on "The Elimination of Discrimination in the Assignment of Children to Special Education Classes for the Mentally Retarded". This memorandum was distributed to chief state school officers and local school district superintendents. It proposed the most comprehensive set of federal guidelines to directly address psychological and educational assessment practices in the schools. The memorandum contained a set of minimum procedures for evaluating and assigning racial-ethnic minority group children to classes for the mentally retarded. These procedures reflected the recommendations of a task force of psychologists, sociologists, and educators serving as consultants to the Office of Civil Rights. The procedures that were outlined required that school districts, as a part of voluntary compliance with Title VI, predicate the assignment of any racial or national-origin minority student to a special education class upon careful review of information developed by psychometric indicators, together with medical and social background data, a teacher's report, and adaptive behavior data. Citing the position taken by the American Association for Mental Deficiency (Grossman, 1973) that in order for an individual to be classified as mentally retarded he must be found to be both sub-normal in intelligence (as determined by valid psychological testing) and in adaptive behavior, the task force concurred that a thorough evaluation of the adaptive behavior of the child can significantly improve the reliability of the total evaluation of minority children relative to assignment to special education classes.

In the same memorandum the Office of Civil Rights suggested that before the testing and evaluation of a student was approved, the school district should insure that the student has been provided with a thorough medical examination covering, at minimum, visual, auditory, speech, and motor systems. A written medical report setting forth the results of

such examination should be maintained by the school district.

Also, in the 1972 memorandum mention was made of non-discriminatory procedures: "A school district which assigns students to special education classes for the mentally retarded must be prepared to insure that cultural factors unique to the particular race or national origin of the student being evaluated, which may effect the results of test findings with regard to adaptive behavior, are adequately accounted."

A more recent memorandum from the Office of Civil Rights dated August, 1975, that was sent to chief state school officers, and local school district superintendents, further identified practices involving the assignment of children to special education programs that may constitute a violation of the Civil Rights Act of 1964. "The disproportionate over or under inclusion of children of race, color, national origin or sex in any special program category may indicate possible noncompliance with Title VI or Title IX. In addition, evidence of the utilization of criteria or methods of referral, placement or treatment of students in any special education program which have the effect of subjecting individuals to discrimination because of race, color, national origin or sex may also constitute noncompliance with Title VI and Title IX".

In developing standards for Title VI and Title IX compliance in the area of special education, the Office of Civil Rights reviewed many of the same requirements that are contained in Public Laws 93-380 and 94-142. In essence, the following practices may constitute a violation of Title VI or Title IX: (1) failure to establish and implement uniform non-discriminatory criteria for the referral of students for possible placement in special education programs; (2) failure to adopt and implement uniform procedures for insuring that children and their parents or guardians are guaranteed procedural safeguards (such as, prior written and oral notice, opportunity for due process hearing, procedures to protect the rights of the child when the parents or guardians are not known, and procedures to insure that, to the maximum extent appropriate, handicapped children are educated with children who are not handicapped; (3) failure to adopt and implement procedures to insure that test materials and other assessment devices used to identify, classify and place handicapped children are

selected and administered in a manner that is non-discriminatory; (4) failure to assess individually each student's needs and to assign her or him to a program designed to meet those individually identified needs; (5) failure to adopt and implement uniform procedures with respect to the comprehensive re-evaluation; and, (6) failure to take steps to assure that special education programs will be equally effective for children of all cultural and linguistic backgrounds.

In September of 1973, the Vocational Rehabilitation Act (Public Law 93-112) was signed into law. As a part of the legislation congress enacted Section 504, which was originally designed to eliminate discrimation in the employment of handicapped individuals in relation to the services provided by vocational rehabilitation. In effect, the law stated that "no otherwise qualified" handicapped person should, by reason of his/her handicap, be excluded from fair and equal consideration in employment by any program or activity receiving Federal financial assistance. The following year, however, congress amended the definition of "handicapped individual" in such a manner so as to no longer limit the concept of discrimination to the dimension of employability. The new definition sought to ensure that no otherwise qualified person who has a "substantially limiting" physical or mental impairment, a record of such an impairment, or is regarded as having such an impairment, shall solely, by reason of handicap, be excluded from participation in, denied the benefits of, or subjected to discrimination under any program or activity receiving federal assistance.

The language of the resultant final regulation for the implementation of Section 504 (issued May 4, 1977) is nearly identical to similar nondiscrimination provisions in Title VI of the Civil Rights Act of 1964 as it relates to racial discrimination and Title IX as it applies to discrimination on the basis of sex. Discriminatory acts typically include denial of opportunity or forced exclusion from participation in activities or programs that receive federal monies. Additionally, the handicapped are not to be provided different or separate benefits or services unless such action is necessary so as to make the receiving aids, benefits and services, as effective as those provided to nonhandicapped individuals.

Operationalization of Definitions

On July 1, 1976 the South Carolina State Board of Education approved an operationalized approach to the identification and placement of handicapped school children. The intention of this approach was to establish reasonable and realistic procedures for the evaluation of handicapped children consistent with federal and state law. However, in addition to the legal impetus, a primary aim was to develop pluralistic assessment techniques with a firm basis in practicality, which would make the old definitions more specific. Under the old guidelines, a child might be considered "handicapped" in one school district and quite "normal" in another. The new criteria would allow more consistency in interpretation of handicapping conditions and would establish procedural safeguards in accordance with mandatory legislation.

Since South Carolina has eight categories of handicapping condition, it is interesting to note how operationalizing the definitions has effected the labeling process. While it is true that labeling may produce negative effects, these effects can be eliminated or significantly reduced by better professional practices. According to Hobbs (1975) in his massive report on the classification of exceptional children: "Classification of exceptional children is essential to get services for them, to plan and organize helping programs, and to determine the outcomes of the intervention efforts. We do not concur with the sentiments widely expressed that classification of exceptional children should be done away with. Although we understand that some people advocate the elimination of classification in order to get rid of its harmful effects, their proposed solution oversimplifies the problem." If one accepts Hobbs conclusion that labeling and classification should continue, then safeguards must be established to control these practices. Operationalized definitions offer the potential for such a safeguard. Adherence to these procedures has reduced unnecessary labeling and classification and has contributed to delivery of the specialized services for children with special learning needs. Emphasizing procedural non-bias for children suspected of being exceptional and in need of special education is, in part, an attempt to build an effective review and control mechanism to guard against improper labeling and classification practices.

The 504 Regulations require that prior to any placement decisions, public schools must conduct an individual evaluation of each student. The evaluation must be conducted using tests and other evaluation instruments that have been validated for the specific purpose for which they are used, and they must be administered by trained personnel in conformance with the instructions provided by their producer. The evaluation instruments must be tailored to access specific areas of educational need and not merely to provide an intelligence quotient. When administered to a student with impaired sensory, manual, or speaking skills, the tests must accurately reflect the student's aptitude or achievement level rather than the student's handicap.

According to the regulations, the placement decision cannot be based solely on intelligence test results. Information from other sources, e.g., teacher recommendations, physical conditions, social and cultural background, and adaptive behavior must also be taken into consideration. Placement decisions are to be made by a group of persons who are knowledgeable of the child, the meaning of the evaluation data, and the placement options. Throughout the evaluation process, parents must have access to procedural safeguards in order to contest any decisions regarding the child. At a very minimal level these standards include prior notice, an opportunity to examine relevant records, an impartial hearing with representation by legal counsel, and a review process.

In sum, P. L. 93-112 stipulates that: 1) handicapped persons, regardless of the nature or severity of their handicap, must be provided a free and appropriate public education; 2) handicapped students must be educated with nonhandicapped students in regular classrooms to the maximum extent possible; 3) all unserved handicapped children must be identified and located by public educatonal institutions; 4) evaluation procedures must be improved to prevent misclassification; and, 5) procedural safeguards must be established so that evaluation and classification decisions can be questioned by parents or guardians. Finally, the regulations also require that schools provide non-academic services and activities in a nondiscriminatory fashion. Such activities include counseling and health services, athletic and transportation.

Operationalized definitions establish a kind of "procedural non-bias". The emphasis is to include only the most valid and reliable assessment instrumentation available and to encourage the consideration of cultural, educational, medical and social data, in addition to psychological data, when planning educational programs for handicapped children. Traditional rather than "culture fair" instrumentation is specified; to be sure, many of the difficulties encountered when using traditional measures have been procedural. In fact, much of the abuse that has surrounded the assessment of culturally different individuals has been from the misuse of collapsed psychometric information, that is to say, test scores, not instrumentation.

In addition to using traditional assessment techniques operational approaches specify "cut-off" IQ ranges for the mentally handicapped. Contrary to popular notion, the delineation of an IQ range can establish a procedural safeguard for the student. If a youngster earns for example, 60 on an intelligence test he or she does not necessarily qualify for placement in a program for the handicapped;however, that option is open. Conversely, if a youngster, scores 80 on an IQ measure he or she does not qualify for placement in a class for the educable mentally handicapped; thus, those youngsters who most often were victims of misclassification, i.e., those whose intelligence scores fell into the range of 75-85, do not qualify. Obviously, many of the youngsters in this IQ range reflect the cultural bias of the instrument itself and not necessarily dull-normal intelligence. For these youngsters, Title I activities and remediation in the regular classroom would seem more appropriate than placement in a program for the mentally handicapped.

It is important to note that although the youngster's score must fall into a specified range for program entry, this is not the case for dismissal. That is, a youngster does not have to earn an IQ above the educable range, for example, in order to be dismissed from an educable classroom to a regular classroom. If a youngster's performance indicates that he or she may in fact be able to perform well in the regular classroom then such recommendations are made. In sum, the intent of the IQ ranges is to establish a procedural safeguard against potential misclassifications, not to foster hasty decisions based on collapsed psychometric information.

For the mentally handicapped, in addition to the use of two standard deviations below the national mean for IQ scores as a criterion we are requiring a measure of adaptive behavior. There is little question that the use of two standard deviations below the mean as well as sub-normal adaptive behavior significantly reduces the racial, cultural disproportions that have most often been associated with misclassification. Of course, this procedure is in concurrence with the AAMD definition of mental retardation, where mental retardation refers to significantly sub-average general intellectual functioning existing concurrently with deficits in adaptive behavior. More specifically, the American Association on Mental Deficiency has advised that only those individuals who demonstrate deficits in both adaptive behavior levels and intellectual levels should be classified as being mentally retarded.

In order to operationalize the definition for educable mentally handicapped one starts with the legal definition, i.e., "Pupils of legal school age whose intellectual limitations require special classes or specialized educational instruction to make them economically useful and socially adjusted."

Under an identification section age requirements are included, the necessity for vision, speech and hearing screening is outlined; and, the requirement that biographical and educational data should be gathered by the school nurse, the regular teacher or counselor is stipulated.

A minimal test battery of at least three (3) different instruments is required. The intelligence measure must be the Wechsler or the Binet; in addition, a measure of adaptive behavior and a supplemental measure is required.

In cases where the youngster manifests minor auditory or visual impairment; supplement instrumentation should be selected from those methods commonly used with the visually and hearing impaired.

Specifically, in order to qualify for enrollment test results and supplemental data must yield consistent findings relative to the following:

1. An IQ in the range of 50-70± the standard error of measurement for the particular test administered. Pupil should show evidence of an intellectual ability of approximately 1/2 to 3/4 that of an average child of comparable chronological age.
2. Consistent subnormal interest performance in all areas evaluated.
3. Biological, environmental, and behavioral data which support the hypothesis that the educational handicap is <u>not</u> a result of behavioral disorders, cultural, or educational deprivation.

As to the requirements for re-evaluation:

1. Reassessment:

   An annual review shall be made by the special class teacher. This review shall include, but not be limited to, the following:

   a) Record of pupil's progress through the educational objectives outlined for the pupil.
   b) Recommendations for educational objectives for the following academic year
   c) Summary of the most recent parent/teacher conference
   d) Speech reports, social history, and new information.

Should the annual assessment indicate a need for re-evaluation, the teahcer may recommend that the pupil receive a complete re-evaluation. All educable mentally handicapped school children are re-evaluated every three (3) years.

To be dismissed from a program a pupil must exceed the legal school age, transfer, or withdraw from the public school. Secondly, a parent or surrogate may request that the services be terminated. Thirdly, the pupil, teacher, and the staffing committee may find that the goals and objectives have been achieved and that the pupil can function adequately in the regular classroom.

In terms of program model it is suggested that itinerant and resource programs be geared toward those who are functioning in the 60-70 intelligence range.

For placement, at minimal, a four member committee should include the psychologist,

a person obtaining the child's social history, a person presenting the child's medical records, and a member of the district's administrative staff.

Additional persons may include the person initiating the referral, the special teacher who may receive the pupil, guidance specialists, etc. The parent must be invited to the staffing.

Record keeping is another area which is dealt with. Complete diagnostic information, including evidence that "procedural due process" has been fully accorded the child, should be housed in one central depository whose site will be determined by the district superintendent. In addition, the principal of each school should maintain a complete placement form for each handicapped child enrolled in any special program in that school.

Each teacher providing special educational instruction should maintain specific instructional objectives for every pupil. These objectives must be updated at least twice per year.

Trainable Mentally Handicapped

For the trainable mentally handicapped, again, one begins with the legal definition: "Pupils of legal school age whose mental capacity is below that of those considered educable, yet who may profit by a special type of training to the extent that they may become more nearly self-sufficient and less burdensome to others".

Under the identification section again, a test battery of least three instruments is required.

The Binet is required because of its extended range at lower levels. As to follow-up, supportive information we are requiring a measure of adaptive behavior from either the Vineland, TMR Performance Scale, the AAMD Adaptive Behavior Scale, the Cain-Levine Social Competency Scale, or the Adaptive Behavior Checklist.

In order to qualify for enrollment test results and supplemental data must yield consistent findings relative to the following:

1. An IQ range of 25-50± standard error of measurement. Candidate should show evidence of an intellectual ability of approximately 1/3 to 1/2 that of an average child of comparable chronological age.

2. Consistent subnormal interest performance in all areas evaluated,

3. Biographical, environmental and behavioral data which support the hypothesis that the educational handicap is not a result of behavioral disorders, cultural or educational deprivation.

4. Assessment of adaptive behavior should indicate a potential for the development of self-help skills to allow for minimal supervision in daily living. In addition, the following criteria should be carefully considered by the staffing committee prior to their recommendation: (A brief documentation of the reasons for the positive/negative decisions should be included in the placement record.)

Candidate should:

1. Be ambulatory to the extent that he/she is no undue risk to himself or others.
2. Be able to communicate to the degree that he/she makes simple needs known.

An annual review should be conducted by the special class teacher; if this review indicates a need for re-evaluation, the teacher may recommend it.

A complete re-evaluation must be done every three years.

The criteria for dismissal should include a provision for residential placement when it is deemed that the program in the public school is inappropriate.

Learning Disabilities (See Federal Regulations)

For the area of learning disabilities, the criteria for participation is as follows:

I. A) Evaluation Team Membership (§121a.540)

It is recommended that the multidisciplinary team should include, but not be limited to, the following persons:

1) The child's regular teacher; 2) if the child does not have a regular classroom teacher an individual who is qualified to teach a child of his or her age (e.g., for a child of less than school age); 3) a person qualified to conduct individual diagnostic examinations as they relate to the specific learning disability (e.g., speech/language pathologist or remedial reading teacher); and. 4) a school psychologist.

B) Placement Committee

At least one member of the evaluating team should serve on the Placement Committee. Additionally, the Placement Committee should require the presence of, at minimal, one person who has knowledge of the child and who has had the opportunity to observe the youngster's performance in an academic or preschool situation. As in all other handicapping conditions, a representative of the school district, a person presenting the child's medical and social history, a psychologist, and the parents are encouraged to participate in the Placement Committee meeting.

II. A) Identification Criteria (§121a.541)

The identification of a severe discrepancy between achievement and intellectual ability should be based upon analysis of the relationship between the highest obtained intelligence measure and standard scores of academic achievement. It is recommended that local educational agencies should adopt a standard criteria that would define a "severe discrepancy" as one where the youngster's standardized achievement score fell at least 1.5 standard deviations below the highest obtained intelligence measure. This recommendation is based upon data that was gathered in relation to four approaches to quantify a severe discrepancy level. More specifically test protocols of 225 students who were referred for evaluation because they "weren't doing well in school", were analyzed. The results indicated that 9.3% of the referred population qualified as having a severe discrepancy when a two deviation criteria was utilized; 12.4% qualified with 1 3/4 standard deviation approach; 16.8% met the requirements of a 1 1/2 standard deviation cut-off; and, 24.8% qualified under the 1 standard deviation criteria. In review of this data, it was recommended that local educational agencies consider the adoption of a 1 1/2 standard deviation approach as the criteria for severe discrepancy level between intelligence and achievement.

The percentages that are reported above reflect the percent of the referred population that qualified. In relation to the theoretical incidence of learning disabilities, the 1 1/2 standard deviation approach was found to identify approximately 2% of

the school age population.

B) Minimal Test Battery

A minimal test battery of 3 instruments is recommended. Here, instrumentation should include: 1) individual measures of achievement; 2) individual intelligence measures (Wechsler or Binet); and, 3) measures of adaptive behavior.

III. Observation (§121a.542)

It is recommended that the required observation should be at least 30 minutes in length and should result in a written and quantifiable observational product (e.g., a checklist, observational rating scale, adaptive behavior scale). Observational components of the written report should include information from the regular classroom teacher in addition to the formal observation by a specialist in learning disabilities, a school psychologist or others with specific training in behavioral observation.

IV. Written Report (§121a.543)

Individual diagnostic reports, observational scales, health, social and educational histories, and all other qualifying data should be attached to the written summary report. The written report as outlined in the Federal Register (§121a.543) should serve as a cover sheet for more detailed documentation. It is strongly recommended that differences in professional judgement relative to placement should be reconciled or filed as minority reports.

Emotionally Handicapped

Finally, for the emotionally handicapped operationalized procedures start with the compilation of specific behavioral data collected over a period of time by the referral source. Secondly, evidence of direct observation of the student by someone other than the referral source is needed. A health screening which would indicate that there are no vision, hearing or physical problems is required. Also, social and educational histories must be gathered.

The minimal test battery should include an achievement measure, two behavior checklists, an intelligence measure and two other measures of psychological functioning.

All pupils enrolled in programs for the emotionally handicapped are re-evaluated every three years.

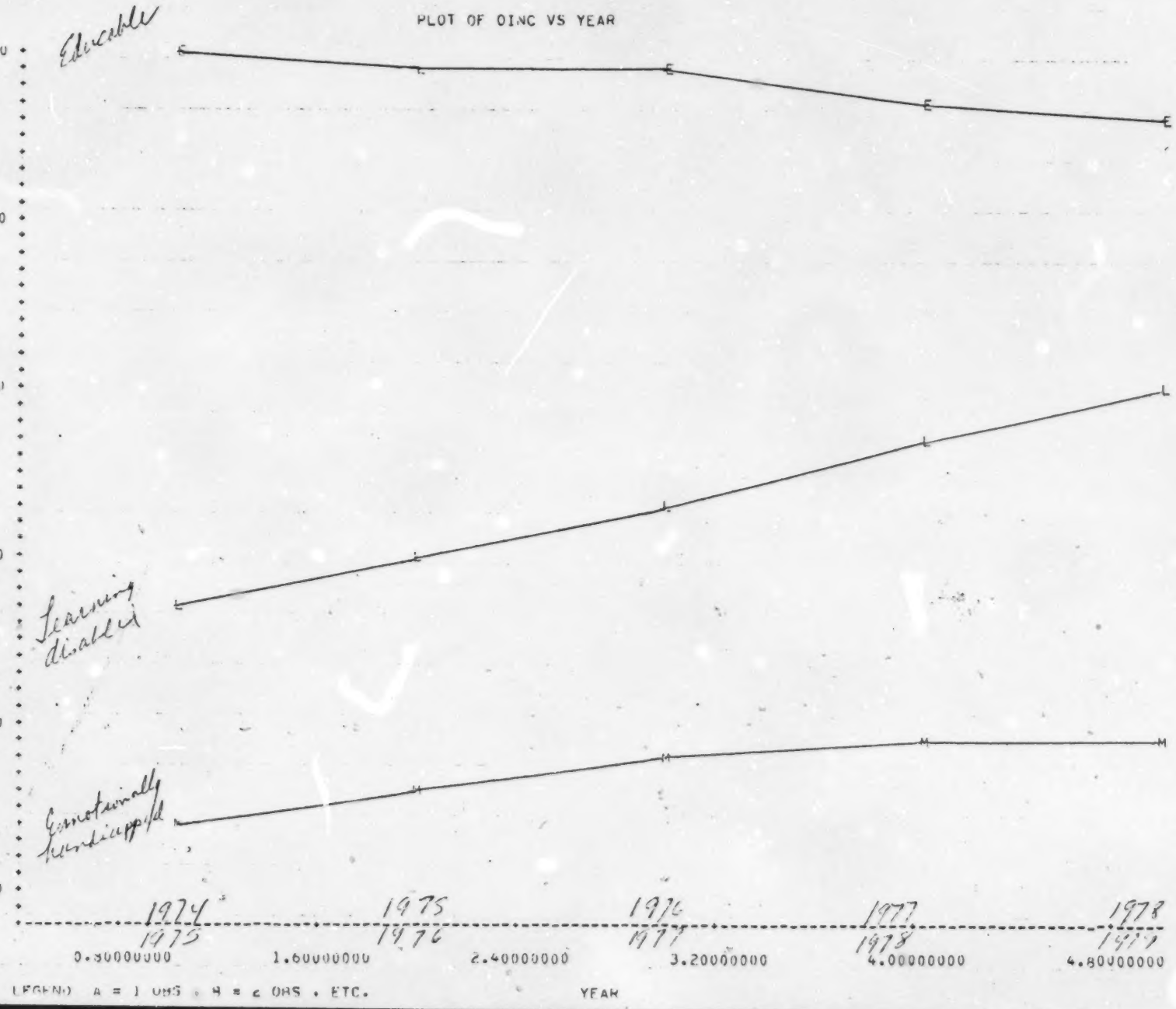
In determing the program model for an emotionally handicapped child, consideration must be given to the severity of the specific handicap.

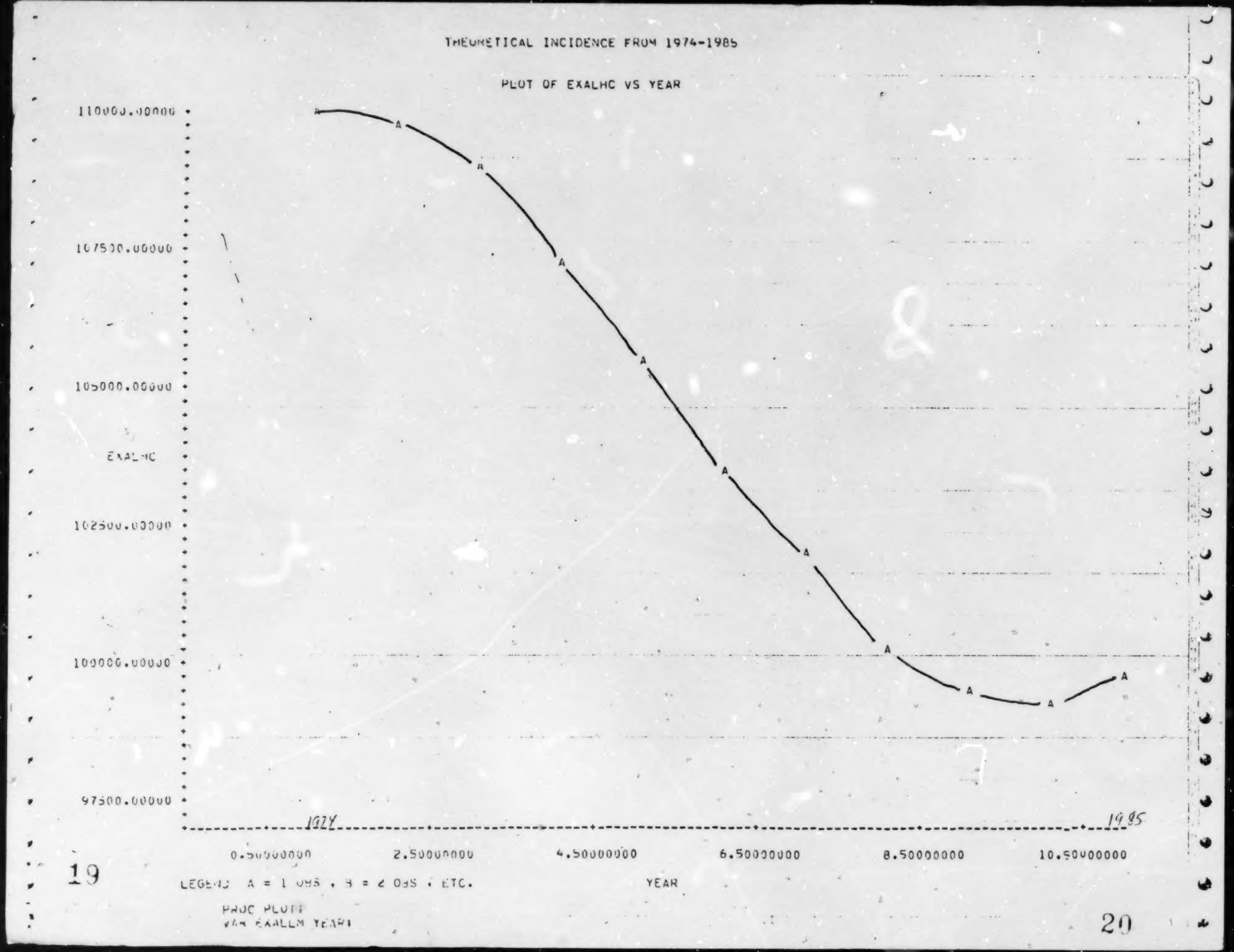
Prior to placement, individually sequenced instructional objectives must be developed for each pupil and kept on file by the special teacher receiving the child. Lastly, we are suggesting written concurrence by a state or community mental health center for placement of an EH child.

All other handicapping conditions are operationalized in a similar manner. For details please refer to South Carolina's Procedures for Survey, Screening, Evaluation, Placement and Dismissal of Children into/out of Programs for the Handicapped.

Lastly, it is important to note the influence of operationalized criteria on the incidence of handicapping conditions. During the 1975-1976 school year the total number of educable mentally handicapped youngsters served in S.C was 27,848. This number reflects a significant reduction from the 28,321 who were labeled as educable one year earlier. Likewise, this reduction has continued for the 1976-1977 school years (27,816) and the and the 1977-1978 school years (26,528). All other categories have increased service in accordance with their theoretical projections for incidence.Perhaps the only area that is in need of further defining is that of learning disabilities; here, 2½% of the five to seventeen population was served in the 1977-1978 school year. It would appear that the Federal definition may be in need of more consistent interpretation.

A COMPARISON OF OBSERVED EMH, EH, AND LD INCIDENCE FROM 1974-1979




THEORETICAL INCIDENCE FROM 1974-1985
PLOT OF EXALHC VS YEAR
110000.00000
107500.00000
105000.00000
EXALHC
102500.00000
100000.00000
97500.00000
1974
1985
0.50000000
2.50000000
4.50000000
6.50000000
8.50000000
10.50000000
YEAR
LEGEND: A = 1 OBS, B = 2 OBS, ETC.
PROC PLOT
VAR EXALLM YEAR;

A COMPARISON OF OBSERVED EMH, EH, LD, AND TMH INCIDENCE FROM 1974-1979

PLOT OF OINC VS YEAR